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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY****REGION 8****999 18TH STREET - SUITE 300****DENVER, CO 80202-2486****Phone 800-227-8917****<http://www.epa.gov/region08>**

Ref:8EPR-SR

Mr. Craig Tessmer
Environmental Analyst
Adams County Planning
4955 East 74th Avenue
Commerce City, CO 80022

RE: Vasquez Blvd/I70 Superfund Site Cleanup

Dear Mr. Tessmer:

The Environmental Protection Agency (EPA) is planning this summer to begin cleaning up residential yards within the Vasquez Blvd/I70 (VB/I70) Superfund Site which have elevated levels of arsenic and lead. A location for the placement of soils excavated from these residential yards is needed. EPA is considering placement of these soils on Asarco's Globe Plant in Adams County located at 495 East 51st Avenue, Denver, CO 80216. The purpose of this letter is to provide background information to Adams County, Department of Planning to determine if a Certificate of Designation is required and permits required from Adams County to allow for placement of these residential soils at the Asarco Globe Plant.

The remainder of this letter provides a background on the VB/I70 Superfund Site and EPA's reasoning for placement of the excavated residential soils at the Asarco Globe Plant.

VB/I70 Superfund Site Background

The VB/I70 site came to the attention of the EPA following studies directed by the Colorado Department of Public Health and Environment (CDPHE) at the adjacent Globeville Site. These studies had identified elevated concentrations of arsenic and/or lead in residential yards within Globeville, and also extending into the Elyria and Swansea neighborhoods which did not appear to be related to the Globe Plant operations. Two other smelter facilities, the Argo and the Grant & Omaha, which had historically operated in this area, were suspected as the source of the elevated soil lead and arsenic levels. Further investigations by EPA identified the VB/I70 site as a site separate from the Globeville Site. The site was listed on EPA's National Priorities List (NPL) on July 22, 1999.

The VB/I70 site covers an area of approximately four square miles in north-central Denver,



Colorado. The site is composed of a number of neighborhoods that are largely residential, including Swansea/Elyria, Clayton, Cole, and portions of Globeville. Most residences at the site are single-family dwellings, but there are also some multi-family homes and apartment buildings. There are approximately 4,000 residential properties within the site boundaries. The site also contains a number of schools, parks, and playgrounds, as well as commercial and industrial properties.

EPA investigations and risk assessment at the VB/I70 site have found elevated levels of arsenic and lead in residential soils. Based on these investigations, EPA has implemented cleanup actions at 50 residential properties which had soil levels of lead and arsenic which were of immediate concern. Clean up includes the of removal and replacement the top 12 inches of soil.

This summer, EPA is planning to begin clean up of residential properties which have soils with levels of lead greater than 540 ppm and/or levels of arsenic greater than 240 ppm. Based on these lead and arsenic levels, EPA has identified 143 properties within the Site that will require clean up.

Currently, EPA is proposing a final residential soil clean up standard for the Site of 400 ppm for lead and 70 ppm for arsenic. If these levels are adopted for the VB/I70 Site, it is estimated that an additional 700 residential properties will require soil clean up.

Why place the excavated residential soils at the Asarco Globe Plant

The following is a summary of EPA's reasoning for placement of soils excavated soils from the VB/I70 site onto the Asarco Globe Plant.

- **Asarco is a Responsible Party at the VB/I70 Site.** As the historic operator of the Grant and Omaha Smelter, Asarco has been identified as a responsible party for the VB/I70 Site. Due to the current financial status of Asarco, placement of the soils on the Globe Plant is how they will contribute toward the clean up costs.
- **The Globe Plant has been used for this purpose.** Soils excavated from residential properties at the Globeville Site have been placed in the Asarco. EPA is planning to use the same procedures to place the excavated soils on the Globeville Site. Residential soils within the VB/I70 site are impacted with fewer metals and are typically found to have lower concentrations than the Globeville Site.
- **The soils can be used beneficially at the Asarco Globe Plant.** To facilitate redevelopment of the Asarco Globe property, large volumes of fill material is needed. The soils excavated from the VB/I70 site are suitable for this purpose. If the soils could not used beneficially at the Asarco Globe Plant, they would be placed in a landfill.
- **Soils excavated are not classified as Hazardous Waste.** Soils excavated from the residential yards already cleaned up at the VB/I70 Site were found to be non-hazardous. It is expected that the remaining residential soils to be excavated will also be classified as

non-hazardous since these soils contain lower levels of arsenic and lead.

- **The State is negotiating an Environmental Covenant with Asarco regarding the Globe Plant Site.** The Environmental Covenant will impose land use restrictions at the Globe Plant Site. These restrictions will, at a minimum prohibit residential use of the property. The covenant will be recorded with the deed. The land use restrictions will be enforceable by Asarco and the State of Colorado against the initial grantees and all subsequent land owners. In addition, Adams County will have the authority, but not the obligation, to file suit to enforce the covenant.
- **Soils excavated are suitable for an industrial facility.** While the lead and/or arsenic soil concentrations are of concern for a residential exposure scenario, the soil concentrations of these metals are suitable for use on an industrial/commercial site. In addition, the highest concentrations are found near the surface. Thus during excavation, cleaner subsurface soils are blended the surface soils, effectively lowering the concentrations of the soils removed from the Site.
- **Reduction in project air emissions.** Alternative locations considered by EPA for placement of these soils are local municipal landfills. These landfills are located at much greater distance from the VB/I70 Site than the Asarco Globe Plant. Reduced hauling distances will result in lower air emissions from trucks transporting excavated soils.
- **Placement of excavated soils at the Asarco Globe Plant will result in cost savings to EPA.** This project is to be entirely funded by EPA. Cost savings will be realized by EPA due to reduced hauling distances and landfill tipping fees. If these soils are not placed on the Asarco Globe Plant, they will be placed in a municipal landfill. The municipal landfills are located at a much greater distance from the VB/I70 site than the Asarco Globe Plant.

Thank you for your time in assisting EPA with the VB/I70 clean up project. I will contact you soon to arrange a conceptual review meeting to further discuss this project. In the meantime, please contact me with any question you have. I can be reached at (303)312-6578.

Sincerely,



Victor Ketellapper
Remedial Project Manager



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FAX TRANSMITTAL COVER SHEET

TO: Craig TessmerAgency / Company Adams County PlanningCity: Commerce City State: COFax Telephone Number 303-853-7015Phone Number 303-853-7000Number of pages to follow Cover Sheet: 3

EPR - SR

EPR-EP

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FROM: Nick KetellapperSENDER'S PHONE #: 303-312-6578COMMENTS: _____

Date Sent: _____ / Time Sent: _____ / Sender: _____